

August 29, 2003

Mr. William G. Pennington  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

Subject: 2005 Energy Efficiency Standards – Residential Lighting

Dear Bill:

Acuity Brands Lighting is the largest manufacturer of lighting equipment in North America and is committed to providing high quality energy efficient lighting products for the residential market through the Lithonia Lighting brand.

We have provided comments through the public workshop process supporting the requirements for high efficacy luminaires in residential applications. This technology is well established and cost effective.

We recommend a reconsideration of the requirements as they relate to electronic ballasts. The current language states: *"Ballasts for lamps rated 18 watts or greater shall be electronic and shall have an operating frequency no less than 20 kHz."* (Section 150 (k) 1.) It is our opinion that basing the requirement on 18 watts or greater may not be in the best interest for promoting effective lighting solutions using high efficacy sources in residential applications. Any sources less than 18 watts will be allowed to use magnetic ballasts, which flicker when they are switched on. This has the potential to negatively influence the perception of consumers that high efficacy lighting does not start immediately and is a nuisance. In order to ensure that residences use energy efficient and effective lighting, it is our recommendation that the requirement be revised to include ballasts for lamps rated 13 watts or greater, rather than 18 watts or greater. By lowering the wattage, it will eliminate a potential loophole allowing the use of products that have poor starting capabilities, will result in greater energy efficiency gains and will ensure a more positive experience and greater demand for fluorescent lighting products in residential applications in the future.

Thank you for your time and consideration of these comments.

Best regards,



Cheryl English  
Vice President, Technical Marketing Services